

EXHIBIT A



Diala Shamas <dshamas@ccrjustice.org>

Fw: [EXTERNAL] Request for Social Contact Visit with U.S. citizen wife and newborn child traveling from New York // Mahmoud KHALIL [REDACTED] (readnow - for Marc's filter)

Nora Ahmed <Nahmed@laaclu.org>

Wed, May 21, 2025 at 10:46 AM

To: "Khalil v. Trump (All-Counsel)" <khalilvTrump_All-Counsel@nyclu.org>

Nora Ahmed | Legal Director

Pronouns: she, her, hers

American Civil Liberties Union of Louisiana

P.O. Box 56157, New Orleans, LA 70156

Tel: 917.842.3902 | nahmed@laaclu.org

*Admitted to the New York Bar, not admitted to the Louisiana Bar

From: [REDACTED] <[REDACTED]>

Sent: Wednesday, May 21, 2025 9:30:07 AM

To: Nora Ahmed <Nahmed@laaclu.org>; [REDACTED] <[REDACTED]>Cc: Marc Van Der Hout <JodyMarc@mindspring.com>; Marc Van Der Hout <MV@vblaw.com>; Johnny Sinodis <Jsin@vblaw.com>; Oona Cahil <Ocah@vblaw.com>

Subject: Re: [EXTERNAL] Request for Social Contact Visit with U.S. citizen wife and newborn child traveling from New York // Mahmoud KHALIL [REDACTED] (readnow - for Marc's filter)

Good Morning,

The visit will remain as non-contact as previously arranged. Thank you.

FACILITY ADMINISTRATOR, GEO SECURE SERVICES

The GEO Group, Inc.®

Central Louisiana ICE Processing Center

Alexandria Staging Facility

830 Pinehill Road

Jena, Louisiana 71342

[REDACTED]
[REDACTED]
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From: Nora Ahmed <Nahmed@laaclu.org>
Sent: Wednesday, May 21, 2025 9:08 AM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Marc Van Der Hout <JodyMarc@mindspring.com>; Marc Van Der Hout <MV@vblaw.com>; Johnny Sinodis <Jsin@vblaw.com>; Oona Cahil <Ocah@vblaw.com>
Subject: Re: [EXTERNAL] Request for Social Contact Visit with U.S. citizen wife and newborn child traveling from New York // Mahmoud KHALIL [REDACTED] (readnow - for Marc's filter)

Good morning Facility Administrator [REDACTED] and DFOD [REDACTED],

As time is of the essence and mom and child are here after traveling 1500 miles, I am checking in on the below request.

Best,
Nora Ahmed | Legal Director
Pronouns: she, her, hers
American Civil Liberties Union of Louisiana
P.O. Box 56157, New Orleans, LA 70156
Tel: 917.842.3902 | nahmed@laaclu.org
*Admitted to the New York Bar, not admitted to the Louisiana Bar

From: Nora Ahmed <Nahmed@laaclu.org>
Sent: Tuesday, May 20, 2025 4:46:52 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Marc Van Der Hout <JodyMarc@mindspring.com>; Marc Van Der Hout <MV@vblaw.com>; Johnny Sinodis <Jsin@vblaw.com>; Oona Cahil <Ocah@vblaw.com>
Subject: Re: [EXTERNAL] Request for Social Contact Visit with U.S. citizen wife and newborn child traveling from New York // Mahmoud KHALIL [REDACTED] (readnow - for Marc's filter)

Thank you, Facility Administrator Rice, for keeping the previously scheduled visits on the calendar.

I am writing again to ask you both—Facility Administrator [REDACTED] and DFOD [REDACTED]—for an exception to CLIPC’s standing no-contact social visitation policy. We come to you requesting your assistance in uniting a new father with his less than one-month old first-born child, who, as you know, was born while his father was detained.

We understand that provision 5.7.V.B. in the PBNDS provides that facility administrators determine whether to permit social contact visits. We also understand that it authorizes exceptions to be made to the visitation standards on a “case-by-case basis when warranted by compelling circumstances.” Those same standards indicate that a facility should “try to facilitate contact visitation when possible” between an individual detainee and his minor child.

So, while we understand the facility’s standing policy for no-contact social visitation, we believe that the circumstances here are beyond compelling. Therefore, we are appealing to both of you to work with us to

find a way for CLIPC to make an exception for Mr. Khalil—so that he can hold his newborn child for the first time.

We are simply trying to unite father and child. Please let us know if it is at all possible to facilitate at least one contact visitation between the two.

Nora Ahmed | Legal Director

Pronouns: she, her, hers

American Civil Liberties Union of Louisiana

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From: [REDACTED] <[REDACTED]>
Date: Tuesday, May 20, 2025 at 3:02 PM
To: Nora Ahmed <Nahmed@laaclu.org>, [REDACTED] <[REDACTED]>
Cc: Marc Van Der Hout <JodyMarc@mindspring.com>, Marc Van Der Hout <MV@vblaw.com>, Johnny Sinodis <Jsin@vblaw.com>, Oona Cahil <Ocah@vblaw.com>
Subject: Re: [EXTERNAL] Request for Social Contact Visit with U.S. citizen wife and newborn child traveling from New York // Mahmoud KHALIL A [REDACTED] (readnow - for Marc's filter)

Good Afternoon Ms. Nora,

I understand your request for contact visitation; however, our facility procedures are for non-contact visitation only. The visit will remain on the schedule for non-contact as previously approved. Thank you.

[REDACTED]

FACILITY ADMINISTRATOR, GEO SECURE SERVICES

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Jena, Louisiana 71342

[REDACTED]

[REDACTED]

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From: Nora Ahmed <Nahmed@laaclu.org>

Sent: Tuesday, May 20, 2025 2:05 PM

To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Cc: Marc Van Der Hout <JodyMarc@mindspring.com>; Marc Van Der Hout <MV@vblaw.com>; Johnny Sinodis <Jsin@vblaw.com>; Oona Cahil <Ocah@vblaw.com>

Subject: Re: [EXTERNAL] Request for Social Contact Visit with U.S. citizen wife and newborn child traveling from New York // Mahmoud KHALIL A [REDACTED] (readnow - for Marc's filter)

Good afternoon DFOD [REDACTED] and Facility Administrator [REDACTED],

I understand per below that CLIPC has denied a contact visit—between Mr. Khalil, his wife, and his newborn child—because the facility does not provide for social contact visits. While I understand the information set forth in the email below, I am trying to square that with what I read as a policy directive that “[c]ontact visits may be facilitated at all ICE detention facilities.” See <https://www.ice.gov/doclib/detention-reform/pdf/facilitatingVisitationParents.pdf> (accessed May 20, 2025) (emphasis added).

Taking into consideration CLIPC’s standing policy denying all social contact visits, I am writing to ask that an exception be made pursuant to the above-mentioned policy, and/or to understand how a limited contact family visit can be provided for considering the age of Mr. Khalil’s son—he is 29 days old today. ICE Directive 11064.3 (Interests of Noncitizen Parents and Legal Guardians of Minor Children or Incapacitated Adults) states that: “It is the policy of ICE to ensure that the agency’s civil immigration enforcement activities do not unnecessarily

disrupt or infringe upon the parental or guardianship rights of noncitizen parents or legal guardians of minor children or incapacitated adults, consistent with all legal obligations and applicable court orders." ICE Directive 11064.3 Section 2.

We fully understand that the PBNDS states that facilities should make decisions and policies for visits within the "constraints of the safety, security and good order of the facility." (5.7.I, *Purpose and Scope*). But we also understand that facilities are encouraged to provide opportunities for *both* contact and non-contact visitation with approved visitors during both day and evening hours. (5.7.II, *Expected Outcomes*) (emphasis added). Moreover, the PBNDS clearly encourage consideration of the particular circumstances at issue for the person detained. 5.7.II.6 ("Generally visits should be for the maximum period practicable but not less than one hour with special consideration given to family circumstances and individuals who have traveled long distances.").

Here, contact visitation for Mr. Khalil with his wife and newborn son poses no risk of violating the facilities' conditions on safety, security, and good order. Indeed, based on public-facing CLIPC policy, it is only family or "social" visits that are non-contact; thus, contact visits are feasible broadly and can be reasonably accommodated. A simple contact visit for Mr. Khalil's wife and newborn child poses no risk of violating the orderly operation of the facility; indeed, as you are aware, the facility is highly secure, with multiple security checkpoints prior to entry. Existing policies already protect against such disruptions, and the minor exception to allow a contact family visit here would leave those in place. Further, such a meeting can be facilitated with minimal staffing requirements, greatly mitigating the impact to the operations of the facility.

Thank you both for considering this request. We are happy to continue working with ICE and CLIPC to identify any limited exception that may provide Mr. Khalil with the opportunity to see his wife, and his newborn son for the first time.

Best,

Nora Ahmed | Legal Director

Pronouns: she, her, hers

American Civil Liberties Union of Louisiana

P.O. Box 56157, New Orleans, LA 70156

Tel: 917.842.3902 | nahmed@laaclu.org

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From: [REDACTED] <[REDACTED]>

Sent: Tuesday, May 20, 2025 7:33 AM

To: Oona Cahill <ocah@vblaw.com>

Cc: Marc @ Home <jodymarc@mindspring.com>; Marc Van Der Hout <MV@vblaw.com>; Johnny Sinodis <jsin@vblaw.com>

Subject: Re: [EXTERNAL] Request for Extended Contact Visits with U.S. citizen wife traveling from New York // Mahmoud KHALIL

A [REDACTED] (readnow - for Marc's filter)

Good Morning,

The dates and times below are good for visitation. Please note that CLIPC does not offer contact visitation. The visitation extension is approved but it will be non-contact. Thank you.

Wednesday, May 21 (6pm-8pm)

Thursday May 22 (6pm-8pm)

Friday May 23 (9am-11am, and 6pm-8pm).

[REDACTED]
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From: Oona Cahill <ocah@vblaw.com>

Sent: Monday, May 19, 2025 9:14 PM

To: [REDACTED] <[REDACTED]>

Cc: Marc @ Home <jodymarc@mindspring.com>; Marc Van Der Hout <MV@vblaw.com>; Johnny Sinodis <jsin@vblaw.com>

Subject: [EXTERNAL] Request for Extended Contact Visits with U.S. citizen wife traveling from New York // Mahmoud KHALIL A [REDACTED] (readnow - for Marc's filter)

Hi Warden,

Thanks again for your assistance coordinating the legal visit for this week. We also wanted to reach out to request that your facility provide extended contact visitation during family visiting hours with Mr. Khalil's U.S. citizen wife, Noor Abdalla, who will be traveling from New York to Louisiana this week to attend Mr. Khalil's hearing and visit her husband. Mr. Khalil's wife would like to visit her husband for as long as possible during the visitation periods on Wednesday, May 21 (6pm-8pm), Thursday May 22 (6pm-8pm), and Friday May 23 (9am-11am, and 6pm-8pm).

Because Ms. Abdalla is traveling from such a great distance after having just given birth to the couple's first child to visit her husband for the first time since he was detained ten weeks ago, we hope and assume that under the circumstances, the facility would be willing to arrange extended contact visitation. This request is in line with ICE's Performance-Based National Detention Standards (PBNDS), which encourage facilitating contact visits and allowing generous visitation policies for family members traveling far distances. See, e.g., PBNDS 5.7, V.I.1 ("ICE/ERO encourages more generous limits when possible, especially for family members traveling significant distances."); PBNDS 5.7, II.4 ("Facilities are encouraged to provide opportunities for both contact and non-contact visitation with approved visitors during both day and evening hours"); II.6 ("Generally visits should be for the maximum period practicable but not less than one hour with special consideration given to family circumstances and individuals who have traveled long distances.").

Please let us know if there is any additional information that would be helpful in processing this request. We would be happy to discuss further on the phone to work out any logistics. Thank you very much for your assistance.

Best,

Oona

Oona Cahill

Litigation & Research Fellow

Van Der Hout LLP

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